

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION
NO. 23-CR-070

UNITED STATES OF AMERICA)

v.)

APRIL EVALYN SHORT)

**MOTION FOR DISCLOSURE OF ALL
EXCULPATORY EVIDENCE**

NOW COMES the Defendant, APRIL EVALYN SHORT (“SHORT”), pursuant to Fed. R. Crim. Proc. 16 and the principles of Brady v. Maryland, 373 U.S. 83 (1963), and its progeny, and asks this Honorable Court to enter an Order directing that counsel for the Government make inquiry forthwith and disclose, or permit SHORT to inspect and copy, information that is either within the possession, custody, or control of the Government, or the existence of which is known through the exercise of due diligence could become known to the Government that may be materially favorable to SHORT, either directly, indirectly or in an impeaching manner, within the purview of Brady, Giglio and their progeny.

This Motion for the Disclosure of Exculpatory Evidence is continuing in nature.

Respectfully submitted, this the 1st day of May, 2024.

/s/ J. Pete Theodocion

J. Pete Theodocion
Attorney for Defendant

LAW OFFICES OF J. PETE THEODOCION
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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, I electronically filed the foregoing **MOTION FOR DISCLOSURE OF ALL EXCULPATORY EVIDENCE** with the Clerk of the Court using the CM/ECF system which will send notification to all interested parties.

/s/ J. Pete Theodocion

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Attorney for Defendant

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